

UNITED STATES DISTRICT COURT  
IN THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WILLIAM RUDD,

Plaintiff,

v.

CITY OF NORTON SHORES,  
GARY NELUND, MARK MEYERS,  
DANIEL SHAW, MATTHEW RHYNDRESS,  
MICHAEL WASILEWSKI,  
CHRIS MCINTIRE, MELISSA MEYERS,  
MICHELLE MCLEAN, JOEL BAAR  
BOLHOUSE, BAAR, & HOFSTEE PC.,  
WILLIAMS HUGHES PLLC, DOUGLAS  
HUGHES.

Defendants.

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Daniel William Rudd  
Pro Se Plaintiff  
201 S. Lake Ave.  
Spring Lake, MI 49456  
(231) 557.2532  
daniel@stock20.com

Michael S. Bogren (P34835)  
PLUNKETT COONEY Attorneys for  
Defendants: City of Norton Shores, Gary  
Nelund, Daniel Shaw, Matthew Rhynress,  
Michael Wassilewski, Mark Meyers, Douglas  
Hughes and William Hughes, PLLC  
950 Trade Centre Way, Ste. 310  
Kalamazoo, MI 49002  
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mbogren@plunkettcooney.com

Case No. 1:18-cv-124

Honorable Gordon J. Quist  
U.S. District Court Judge

**CERTIFICATE OF CONCURRENCE  
REGARDING  
4/4/2018 STIPULATION TO CORRECT  
CLERICAL ERROR**

Rock Wood (P41181)  
MI. DEPT. OF ATTORNEY GENERAL  
Attorneys for Defendant Chris McIntire  
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**CERTIFICATE OF CONCURRENCE REGARDING**  
**4/4/2018 STIPULATION TO CORRECT CLERICAL ERROR**

A stipulation was reached with Attorney Bogren, on behalf of his client Jon Gale, to correct Plaintiff's error in failing to list Jon Gale as a defendant in the caption of his complaint. Upon obtaining Attorney Bogren's stipulation, Plaintiff also provided a copy of the stipulation to Attorney Wood and Attorney McLean who did not object.

**Stipulation Adding Jon Gale as Defendant**

3 messages

**Daniel Rudd** <[daniel@stock20.com](mailto:daniel@stock20.com)> Thu, Apr 5, 2018 at 11:34 AM  
To: "Wood, Rock A. (AG)" <[WoodR5@michigan.gov](mailto:WoodR5@michigan.gov)>, Michelle McLean <[michellem@bolhouselaw.com](mailto:michellem@bolhouselaw.com)>  
Cc: "Bogren, Michael" <[mbogren@plunkettcooney.com](mailto:mbogren@plunkettcooney.com)>

Attorney Wood & Attorney McLean,

Please see the attached stipulation and proposed order regarding an agreement reached between Attorney Bogren and myself regarding a clerical error in my complaint (failure to list Chief Gale as a defendant in the caption).

I do not believe that this has any bearing on your clients, but thought I would provide an opportunity for you to view it before it is submitted to the Court next week.

If you have any questions or concerns, please let me know.  
Daniel Rudd

cc. Attorney Bogren

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 [stip-adding jon gale as defendant-for review.pdf](#)  
205K

**Michelle McLean** <[michellem@bolhouselaw.com](mailto:michellem@bolhouselaw.com)> Thu, Apr 5, 2018 at 1:55 PM  
To: Daniel Rudd <[daniel@stock20.com](mailto:daniel@stock20.com)>, "Wood, Rock A. (AG)" <[WoodR5@michigan.gov](mailto:WoodR5@michigan.gov)>  
Cc: "Bogren, Michael" <[mbogren@plunkettcooney.com](mailto:mbogren@plunkettcooney.com)>

No objection here.

**From:** Daniel Rudd [mailto:[daniel@stock20.com](mailto:daniel@stock20.com)]  
**Sent:** Thursday, April 05, 2018 11:34 AM  
**To:** Wood, Rock A. (AG) <[WoodR5@michigan.gov](mailto:WoodR5@michigan.gov)>; Michelle McLean <[michellem@bolhouselaw.com](mailto:michellem@bolhouselaw.com)>  
**Cc:** Bogren, Michael <[mbogren@plunkettcooney.com](mailto:mbogren@plunkettcooney.com)>  
**Subject:** Stipulation Adding Jon Gale as Defendant

[Quoted text hidden]

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**Wood, Rock A. (AG)** <[WoodR5@michigan.gov](mailto:WoodR5@michigan.gov)> Thu, Apr 5, 2018 at 2:10 PM  
To: Daniel Rudd <[daniel@stock20.com](mailto:daniel@stock20.com)>, Michelle McLean <[michellem@bolhouselaw.com](mailto:michellem@bolhouselaw.com)>  
Cc: "Bogren, Michael" <[mbogren@plunkettcooney.com](mailto:mbogren@plunkettcooney.com)>

I am fine with this.

Plaintiff now advises this Court that there is no opposition to entry of an order correcting this clerical error by entry of the proposed stipulated order.

Respectfully submitted on 4/19/18:

/s/ Daniel William Rudd

Daniel William Rudd, Plaintiff (Pro Se)  
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